

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

KATE GOSSELIN,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	
)	NO.: 13:4989
JONATHAN K. GOSSELIN, ROBERT)	
HOFFMAN, and JOHN AND JANE DOES)	
1-20)	
)	
Defendants.)	

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff Kate Gosselin, by and through her attorney, A. Jordan Rushie, and Defendant Jonathan K. Gosselin, by and through his attorneys, BrittonTuma and Orwig Law Offices, files this Joint Motion to Dismiss with Prejudice pursuant to Federal Rule of Civil Procedure 41(a) and (c) and in support thereof, state as follows:

Plaintiff Kate Gosselin agrees to dismiss with prejudice all claims and potential claims that she has or may have against Defendant Jonathan K. Gosselin that were or could have been asserted in this case.

By this motion, Plaintiff Kate Gosselin is not dismissing her claims against any Defendant other than Defendant Jonathan K. Gosselin.

Defendant Jonathan K. Gosselin agrees to dismiss with prejudice all counterclaims or potential counterclaims that he has or may have against Plaintiff Kate Gosselin that were or could have been asserted in this case.

Dismissal with prejudice of the claims and/or counterclaims between Plaintiff Kate Gosselin and Defendant Jonathan K. Gosselin is appropriate pursuant to Federal Rule of Civil Procedure 41(a) and (c).

WHEREFORE, Plaintiff Kate Gosselin and Defendant Jonathan K. Gosselin agree that an order dismissing the asserted and potential claims and counterclaims between them with prejudice is appropriate and respectfully request that the Court enter such order.

Respectfully submitted,

Dated: November 19, 2013

/s/ A. Jordan Rushie

2424 E York Street, Suite 316
Philadelphia, PA 19125
p. 215.385.5291
Attorney for Kate Gosselin

/s/ Shawn E. Tuma

Shawn E. Tuma
BrittonTuma
7161 Bishop Road, Suite 220
Plano, Texas 75024
d. 469.635.1335
f. 972.767.3181
e. stuma@brittontuma.com

Richard L. Orwig (Associate Counsel)
Orwig Law Offices
2213 Quarry Dr., Suite B001
West Lawn, PA 19609
p. 610.898.9880
f. 610.898.1323
e. rlorwig@orwiglaw.com

Attorneys for Jonathan K. Gosselin

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via ECF upon all counsel of record in the above-styled civil action on November 19, 2013.

/s/ Shawn E. Tuma

Shawn E. Tuma